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BEFORE THE  
PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

FILED  
2005 MAR 21 A 11:35  
PUBLIC UTILITIES  
COMMISSION

In the Matter of the Application of )  
HAWAIIAN ELECTRIC COMPANY, INC. )  
For Approval of Rate Increases and )  
Revised Rate Schedules and Rules, and for )  
Approval and/or Modification of Demand- )  
Side and Load Management Programs and )  
Recovery of Program Costs and DSM Utility )  
Incentives. )

DOCKET NO. 04-0113

DEPARTMENT OF DEFENSE'S SECOND  
SUBMISSION OF INFORMATION REQUESTS  
TO HAWAIIAN ELECTRIC COMPANY, INC.

AND

CERTIFICATE OF SERVICE

RANDALL Y.K. YOUNG  
Associate Counsel (Code 09C)  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Telephone (808) 474-5514

ATTORNEY FOR  
DEPARTMENT OF DEFENSE

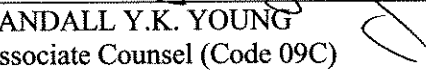
BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

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HAWAIIAN ELECTRIC COMPANY, INC.	)	DOCKET NO. 04-0113
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Recovery of Program Costs and DSM Utility	)	
Incentives.	)	

DEPARTMENT OF DEFENSE'S FIRST  
SUBMISSION OF INFORMATION REQUESTS  
TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE ("Applicant") by and through their respective attorneys, hereby submit its Submission of Information Requests to Hawaiian Electric Company, Inc. ("HECO").

DATED: Honolulu, Hawaii, March 21 2005.

  
RANDALL Y.K. YOUNG  
Associate Counsel (Code 09C)  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Telephone (808) 474-5514

ATTORNEY FOR  
DEPARTMENT OF DEFENSE

DOCKET NO. 04-0113  
DEPARTMENT OF DEFENSE'S SECOND  
SUBMISSION OF INFORMATION REQUESTS  
TO HAWAIIAN ELECTRIC COMPANY, INC.  
INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

1. For each response, HECO should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
4. Should HECO claim that any information is not discoverable for any reason:
  - a. State all claimed privileges and objections to disclosure;
  - b. State all facts and reasons supporting each claimed privilege and objection;

- c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and
  - d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
5. Please provide each response in electronic format (if available) as well as paper. Please provide two copies of each response, with one copy going directly via overnight delivery to Department of Defense's consultant at the following address:

Mr. Maurice Brubaker  
1215 Fern Ridge Parkway, Suite 208  
P.O. Box 412000  
St. Louis, MO 63141-2000  
Fax: 314-275-7036  
Email: bai@mvp.nes

and the other copy going directly via overnight delivery to:

Dr. Kay Davoodi  
Utilities Rates and Studies Office  
NAVFAC Washington  
1314 Harwood Street, S.E.  
Washington Navy Yard, DC 20374-5018

DEPARTMENT OF DEFENSE'S SECOND SUBMISSION OF INFORMATION  
REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 04-0113

The following information requests are directed to HECO.

- DOD/HECO-IR-2-1 Please provide a listing of the following adjustment factors, including all filings with the Commission, by month, for the period January 2003 through December 2004. The adjustments should correspond to the rates applied to the monthly customer bills for the requested period.
- a. AES Rate Adjustment pursuant to HECO-105, page 5.
  - b. Energy Cost Adjustment as set forth in HECO-105, pages 30 and 31.
  - c. Integrated Resource Planning Cost Recovery Provision as set forth in HECO-105, Pages 40 and 41.
- DOD/HECO-IR-2-2 Referring to the Embedded Cost of Service Study in HECO-WP-2202, pages 1 through 173, please provide an electronic copy in Microsoft Excel format, with all formulas intact, including all cost of service studies and all functionalization, classification, allocation and unitization at present rates, proposed rates and at equal rates of return.
- DOD/HECO-IR-2-3 Referring to HECO-WP-2202, page 83 of 173, please provide workpapers showing the calculation of the following Embedded Cost of Service Study allocation factors:
- a. Average Excess Demand (D1)
  - b. Composite NCD (D3)
- DOD/HECO-IR-2-4 Referring to the Energy Cost Adjustment Clause, as proposed, appearing on Pages 31 and 32 of HECO-106, please provide the supporting detail for the proposed new base costs for fuel and purchased power, including the cost of each individual source in each category, the percentage weighting of each source in each category, and the workpapers showing quantities, cost per unit prices, and the weighted average values.
- DOD/HECO-IR-2-5 Referring to HECO T-1, Page 10, please provide a copy of the Adequacy of Supply report filed on March 31, 2004.
- DOD/HECO-IR-2-6 Within the P-DP customer group in the cost of service study, please provide the number of customers, non-coincident customer demand and kilowatthours (or an estimate of each) associated with customers who receive service at the primary voltage level, but from the low side of a HECO-owned single customer substation that is fed from the HECO transmission system. Also provide the revenues under present rates and under proposed rates associated with such customers.

DOD/HECO-IR-2-7 Please provide a copy of HECO's IRP-3 filing, any Commission orders pertaining to IRP-3, and any documents detailing the course of action adopted as the result of the process.

DOD/HECO-IR-2-8 Please provide a copy of HECO's Adequacy of Supply letter to the PUC dated March 31, 2004, as mentioned at Line 4 of Page 38 of HECO T-10.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing SECOND SUBMISSION OF INFORMATION REQUESTS as duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

William A. Bonnet  
Vice President, Government and Community Affairs  
Hawaiian Electric Company, Inc.  
P.O. Box 2750  
Honolulu, Hawaii 96840

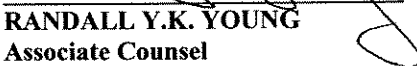
Patsy H. Nanbu  
Director, Regulatory Affairs  
Hawaiian Electric Company, Inc.  
P.O. Box 2750  
Honolulu, Hawaii 96840

Thomas W. Williams, Jr., Esq.  
Peter Y. Kikuta, Esq.  
Goodsill Anderson Quinn & Stifel  
1800 Alii Place  
1099 Alakaa Street  
Honolulu, Hawaii 96813

Department of Commerce and Consumer Affairs  
State of Hawaii  
Division of Consumer Advocacy  
335 Merchant Street, Room 326  
Honolulu, Hawaii 96813

6 Copies

DATED: Honolulu, Hawaii, March 21, 2005

  
RANDALL Y.K. YOUNG  
Associate Counsel  
Naval Facilities Engineering Command,  
Pacific